

Torres, Francine

From: ioia@rangeweb.net%inter2 [ioia@rangeweb.net] on behalf of ioia@rangeweb.net
Sent: Tuesday, February 22, 2005 12:13 PM
To: Torres, Francine
Cc: wildfarms@earthlink.net%inter2
Subject: Comment to NOSB
Attachments: ATTACHMENT.TXT; letter.wfa.doc

Please see attached letter to the NOSB. I have a signature on file, but am unable to sign by digital signature. I'm also including below in text.

February 22, 2005

Jim Riddle, Chair of NOSB
c/o Ms. Francine Torres
USDA-AMS-TMD-NOP
1400 Independence Avenue, SW.
Room 4008-So. Ag Stop 0268
Washington, DC 20250-0200

Dear NOSB:

Please consider endorsing the biodiversity conservation criteria as additions to NOSB's model Organic System Plan (OSP), as proposed by the Wild Farm Alliance.

The requirement for biodiversity conservation is already in the National Organic Program rule, but it has not always been adequately addressed. There is disparity in the attention that different certification agencies give to biodiversity and protection of natural resources. Inspectors are keenly aware of differences that arise in application of the same rule by different agencies. Endorsement of the biodiversity conservation criteria by the NOSB would help establish a commonly understood expectation of what it means to conserve biodiversity, and to maintain or improve the natural resources of the farm or ranch, so that each certifier would not have to figure it out on their own.

The NOSB's model OSP currently addresses biodiversity only in a limited way. This request does not seek to rewrite the rule or ask for clarification, rather it provides another tool to enhance biodiversity implementation. These additions to the OSP can be used in any farm size or situation.

The biodiversity criteria were developed by a broad based group composed of organic farmers, certifiers, conservationists, and inspectors including IOIA members and management.

The NOSB's endorsement of these additions to the model OSP would enhance application of the NOP rule, as broadly described in 7 CFR 205.200. *Production practices must maintain or improve the natural resources of the operation, including soil and water quality.*

IOIA encourages you to consider an endorsement. Thank you.

Sincerely,

2/22/2005

Margaret Scoles
Executive Director

cc: Wild Farm Alliance

Thank you.

Margaret Scoles
IOIA Executive Director
Independent Organic Inspectors Association
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